

Exhibit G

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CYTOLOGIX CORPORATION,

Plaintiff,

v.

VENTANA MEDICAL SYSTEMS, INC.,

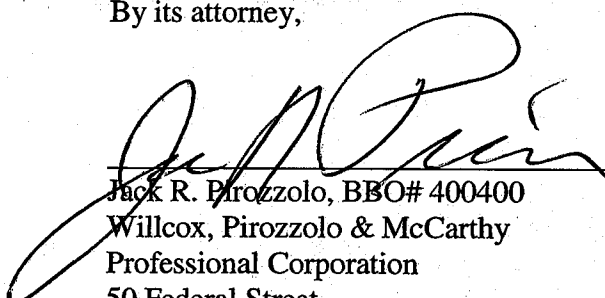
Defendant.

CIVIL ACTION
NO. 00-12231-RWZ
NO. 01-10178-RWZ

PLAINTIFF'S PROPOSED JURY INSTRUCTIONS

Plaintiff CytoLogix Corporation ("CytoLogix") submits the attached proposed jury instructions. Plaintiff reserves the right to supplement, withdraw or amend this set of proposed jury instructions, or any individual instruction or instructions contained therein, based upon this Court's rulings or the evidence or for any other reason.

By its attorney,


Jack R. Pirozzolo, BBO# 400400
Willcox, Pirozzolo & McCarthy
Professional Corporation
50 Federal Street
Boston, Massachusetts 02110
(617) 482-5470

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document
was served upon the attorney of record for each other
party by mail hand on 12-8-05



limitation in a claim of a CytoLogix patent infringes that claim, regardless of whether or not it contains an additional element or elements.

See, Carl Zeiss Stiftung v. Renishaw PLC, 945 F.2d 1173, 1178 (Fed. Cir. 1991); A.B. Dick Co. v. Burroughs Corp., 713 F.2d 700, 703 (Fed. Cir. 1983), cert. denied, 464 U.S. 1042 (1984); United States v. Telectronics, 857 F.2d 778, 783 (Fed. Cir. 1988), cert. denied, 490 U.S. 1046 (1989), quoting, Smith v. Snow, 294 U.S. 1, 16 (1935); see also, Abate, Beck, et als, Federal Circuit Bar Association Model Patent Jury Instructions, § 7.5 (2002), and authorities cited therein; American Intellectual Property Law Association Model Patent Jury Instructions, Claim Construction and Infringement No. 11.

7. When you consider the claims, each word in the claims is given its ordinary and customary meaning. You are to use such ordinary and customary meanings in determining whether Ventana infringed claims of the CytoLogix patents. You are not to use any "special" or non-standard meanings.

See Pattern Jury Instructions, Eleventh Circuit, Patent Infringement General Instruction, § 8.1 (2000); Vitronics Corp. v. Conceptronic, Inc., 90 F.3d 1576, 1582 (Fed. Cir. 1996); Teleflex, Inc. v. Ficosa North America Corp., 299 F.3d 1313, 1325 (Fed. Cir. 2002).

In the event that subsequent rulings of the Court make it appropriate, CytoLogix requests that the Court give the following instruction:

8. Under the law it is given to the Judge to decide what a patent means. I am going to instruct you as to the meaning and scope of certain limitations and elements of the claims of both patents. As a matter of law, you are required to use these instructions in determining whether Ventana infringed one or both CytoLogix patents.

Communicating Data To Regulate The Electrical Power: Communicating data to regulate the electrical power means that data is communicated from the user interface for the purpose of regulating or adjusting the amount of electric power to the heating elements.

Computer: A computer is a device that can perform calculations.

Data Communication Link: A data communication link is a connection through which data is transmitted.

Electronic Control For Heating: Electronic control for heating is the use of electronics to control the heating stations.

First Heating Element / Second Heating Element: First and Second Heating Elements are at least two heating elements associated with at least one microscope slide per heating element. The heating elements are characterized by "separate electrical power connections," as described below.

Heater: A heater is a device that provides heat, and includes at least one heating element.

Heating Element Set: A heating element set contains at least one heating element that heats at least one slide.

Heating Station: Heating station means a slide support and heating element capable of directly heating at least one microscope slide by conductive heating, e.g., direct contact of a heated surface to a portion of the microscope slide to be heated.

In Communication With: In communication with is the provision of temperature data from the user interface to the temperature controller. The communication may occur before a staining run has started, at the beginning of a staining run, or as a run progresses.

Random Access: Random access is the capability of an instrument to perform any of a list of procedures to any of a plurality of biologic samples mounted on microscope slides.

Separate Electrical Power Connections: Separate electrical power connections means that each heating element has immediately separate connections to power and ground from the other heating elements.

Temperature Controller: The temperature controller is the switch, power amplifier or like device that directly adjusts the flow of electric power to one or more heating elements. The temperature controller includes a means for converting temperature data.

Temperature Controller Electronic Circuit: The temperature controller electronic circuit is the electronic components, wiring, and printed circuit board which comprise the power amplifying device and the decoder.

User Interface: The user interface is the device(s) through which the user (operator of the instrument) inputs information into the instrument. Examples include a mouse, keyboard, monitor, placement of a bar code on a slide, and electronic circuits.

Other than the above definitions, the words in the questions and "in [the] claim[s]" are generally given their ordinary and customary meaning"

Vitronics Corp. v. Conceptronic, Inc., 90 F.3d 1576, 1582 (Fed. Cir. 1996); Teleflex, Inc. v. Ficosa North America Corp., 299 F.3d 1313, 1325 (Fed. Cir. 2002).